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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

AMY BUCHANAN

Plaintiff,

vs.

WATKINS & LETOFSKY, LLP., a Nevada
Limited Liability Partnership; and DOES 1-X,
inclusive,

Defendants.

Case No.: 2:19-cv-00226

**NOTICE OF REMOVAL OF ACTION
UNDER 28 U.S.C. § 1441(a)
(FEDERAL QUESTION)**

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that defendant WATKINS & LETOFSKY, LLP, hereby
removes to this Court the state court action described below.

- 1) On December 24, 2018, an action was commenced in the Eighth Judicial District
Court of the State of Nevada, in and for the city of Las Vegas, County of Clark
(hereinafter, "Clark County District Court" or "CCDC"), entitled Amy Buchanan vs.
Watkins & Letofsky, LLP, et al., as case number A-18-786564-C, hereto attached as
Exhibit "A."

- 1 2) The first date upon which defendant Watkins & Letofsky, LLP received a copy of the
2 plaintiff's complaint was January 22, 2019, when Defendant was served with a copy
3 of the said complaint and a summons from CCDC. A copy of the summons is
4 attached hereto as Exhibit "B."
- 5 3) This action is a civil action of which this Court has original jurisdiction under 28
6 U.S.C. § 1331, and is one which may be removed to this Court by defendant pursuant
7 to the provisions of 28 U.S.C. § 1441(a) in that it arises under the Americans with
8 Disabilities Act of 1990 ("ADA") as amended by the Americans with Disabilities Act
9 Amendments Act of 2008 ("ADAAA"), under 42 U.S.C. § 12101, et seq. and P.L.
10 110-325, for claims of discrimination and retaliation.
- 11 4) There are no other defendants in this action.

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13 DATED: February 6, 2019

WATKINS & LETOFSKY, LLP

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15 By: */s/ Daniel R. Watkins*

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